

Intellectual Property Owners Association (IPO)
Comments on 72 Fed. Reg. 9196

under the supervision of an attorney. Selection of an assignment or licensing agreements prepared and approved by an attorney would generally fall under such an allowance. Allowing paraprofessionals to engage in these types of activities is particularly important in a corporate environment where only one or two form agreements may be used in certain clearly defined situations. Completion of such agreements and modification of the agreements under the direction of an attorney should be permitted. Explicit recognition that selection and completion of an assignment is incidental to the filing of an application as long as it is not prohibited by state law is important to the effective utilization of patent agents.

We thank you for the opportunity to provide comments. Please feel free to contact me if you would like to discuss these or other issues addressed in the proposed rules in more detail.

Sincerely,

A handwritten signature in black ink that reads "Herbert C. Wamsley". The signature is written in a cursive, flowing style.

Herbert C. Wamsley
Executive Director